



September 15, 2004

**By Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, D.C. 20554

Re: Written Notice of Oral Ex Parte Contacts Separately filed in the following proceedings:

*Developing a Unified Intercarrier Compensation Regime*, CC Docket 01-92;  
*Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket 96-98; *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket 99-68

*SBC IP Communications, Inc. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commissions Rules Regarding Access to Numbering Resources*, CC Docket 99-200.

*Unbundled Access to Network Elements* WC Docket 04-313, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket 01-338

*IP-Enabled Services* WC Docket 04-36

Dear Ms. Dortch:

On Monday, September 13, 2004, Commissioner Thomas Dunleavy (NY) - a National Association of Regulatory Utility Commissioners (NARUC) North American Numbering Council (NANC) representative and Vice Chair of NARUC's Telecommunications Committee, Commissioner Loretta Lynch (CA) - also a NARUC NANC representative Commissioner Robert Nelson (MI) - an NARUC NANC representative and Chair of NARUC's Telecommunications Committee, and finally NARUC General Counsel Brad Ramsay visited the FCC.

While at the FCC the following meetings took place.

Commissioners Lynch and Dunleavy met with FCC Commissioner Michael Copps and Jessica Rosenworcel;

Commissioners Lynch, Dunleavy, and Nelson met with FCC Commissioner Kevin Martin;

Commissioners Dunleavy and Nelson met with FCC Commissioner Kathleen Abernathy and Matt Brill;

Commissioners Dunleavy and Nelson meet with Wireline Competition Bureau Chief Jeffrey Carlisle; and, finally,

Commissioners Lynch, Dunleavy, and Nelson, along with Mr. Ramsay, met with FCC Commissioner Jonathan Adelstein and Scott Bergmann.

Subsequently on September 14, 2004, Commissioner Nelson met with Chairman Powell.

In each of these meetings one or more of the following positions was discussed or advanced:

- On the Triennial Review further notice, WC Docket 04-313, the State commissioners urged their FCC colleagues to assure that States could file, in addition to some sort of summary, significant parts of their records in electronic rather than paper formats. The State commissioners pointed out this was more efficient and would reduce the burdens on both the FCC and States – as well as provide the FCC with more useful access to the record materials.
- On SBC's petition re: the release of NANP numbers to it for IP services, CC Docket 99-200, the State regulators urged their federal colleagues to, at a minimum, wait for a recommendation from the NANC before ruling.
- On Reciprocal Compensation (RC), CC Docket 01-92, the State commissioners suggested generally that any rationale underlying the FCC order on remand expected by October 8 on the treatment of ISP-Bound traffic should recognize the traffic, as the remand order suggests, that such traffic is within the scope § 251(b)(5) (and subject to 252 procedures.)
- On the IP generic rulemaking, WC Docket 04-36, the State commissioners pointed out how separating out state authority issues would undermine ultimate resolution of the docket and urged the commissioners not to act on IP issues in a piecemeal fashion. This suggestion included action on the SBC petition referenced in (2) *supra*.

NARUC respectfully requests any waivers needed to make this filing one day out of time. If you have questions about this filing, please feel free to contact the undersigned at 202.898.2207 or [jramsay@naruc.org](mailto:jramsay@naruc.org)

Sincerely,

James Bradford Ramsay  
NARUC General Counsel